

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TATIANA WESTBROOK, an individual;
JAMES WESTBROOK, an individual; HALO
BEAUTY PARTNERS, LLC, a Nevada Limited
Liability Company,

Plaintiffs,

v.

KATIE JOY PAULSON, an individual;
WITHOUT A CRYSTAL BALL, LLC, a
Minnesota Limited Liability Company; and
DOES 1 through 100, inclusive,

Defendants.

NO. 2:20-cv-01606-BJR

**DECLARATION OF ELANA R. LEVINE
IN RESPONSE TO DEFENDANTS'
MOTION FOR STATUS CONFERENCE**

**DECLARATION OF
ELANA R. LEVINE -1**
(2:20-CV-01606-BJR)

CARROLL, BIDDLE, & BILANKO, PLLC
1000 2nd Avenue, Suite 3100
Seattle, WA 98104

1 I, ELANA R. LEVINE, hereby state as follows:

2 1. I am an attorney admitted *pro hac vice* to appear before the U.S. District Court for
3 the Western District of Washington in the above-captioned matter, and am Senior Counsel of
4 Jacobson, Russell, Saltz, Nassim & de la Torre, LLP, counsel for Plaintiffs Tatiana Westbrook,
5 James Westbrook, and Halo Beauty Partners, LLC in this matter. I am over the age of eighteen
6 and am competent to testify to the facts stated herein.

7 2. This case arose out of Defendants' publication of false statements in articles on
8 Patheos.com, over 80 videos on YouTube and Instagram, and hundreds of social media postings
9 maligning Tati and James Westbrook and their business, Halo Beauty. One of Defendants' false
10 statements was that court documents establish that Plaintiff James Westbrook had removed his
11 mother from oxygen to cause her untimely death for inheritance purposes, when no court
12 documents actually contain such allegations. Additionally, Defendants have made numerous
13 other damaging statements about Plaintiffs purportedly based on pleadings in other litigation that
14 simply are not in said pleadings. A number of these false statements have been identified into
15 Plaintiffs' Complaint, filed in this case on October 30, 2020.

16 3. Since the filing of this case on October 30, 2020, Defendants have attempted to
17 diverted public attention to the attorneys, and have been making numerous public comments
18 about the case for the purposes of creating prejudice to Plaintiffs (who have yet to make a single
19 public statement about this case).

20 4. Attached hereto as **Exhibit "1"** is an index of a sampling of unsolicited social
21 media postings that Defendants have made regarding this case since the filing of the lawsuit.
22 Additional social media posts, and screenshots of said posts, are mostly publicly available (some
23 have been either deleted or hidden) and can be provided to the Court upon request.

24 5. Attached hereto as **Exhibit "2"** is an index of a sampling of YouTube videos in
25 which Defendants have discussed this case either directly or indirectly since the filing of this
26

lawsuit. The videos are mostly publicly available (some appear to have been deleted or privated) and can be provided to the Court upon request.

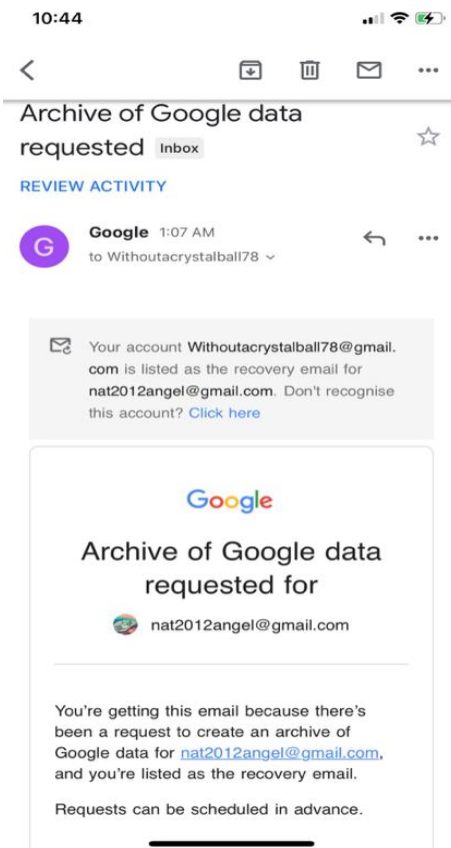
6. On January 7, 2021, I observed a tweet from Defendants' Twitter account stating, "Email communications go both ways – trust me. Just like I'm being watched – so are you. We know everything." This tweet, coupled with Defendants' other social media publications on January 7, 2021 concerning this case led me to perceive this tweet to mean that Defendants were implying that they had access to either my firm's emails and/or my clients' emails. Below is a true and correct copy of a screenshot of said tweet:



7. On January 16, 2021, Michael J. Saltz, counsel for Plaintiffs and partner at my firm tweeted that someone attempted to gain entry to his Google and Twitter accounts. At no time did he publicly accuse Ms. Paulson, or any other specific person, for the attempted hacking of his accounts.

8. Approximately an hour later, on or about January 17, 2021, Defendants tweeted that they too had been the victim of a hacking attempt. Defendants included screenshots to demonstrate the purported hacking attempt to which they were referring. However, the screenshots show that Defendants' email was not actually being hacked, but rather Defendants' email address was being used to: (1) set up a recovery email address for Natalie Kennett's email account, and (2) order and receive an archive of Ms. Kennett's emails. As such, rather than putting forth evidence of being hacked, Ms. Paulson actually put forward evidence that she was

1 receiving the benefit and bounty of our witness being hacked. Below is a true and correct copy of
2 a screenshot of said tweet:



**DECLARATION OF
ELANA R. LEVINE -4**
(2:20-CV-01606-BJR)

CARROLL, BIDDLE, & BILANKO, PLLC
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Seattle, WA 98104

9. On January 18, 2021, Counsel for Defendants, Michael Brown sent an unsolicited email to Plaintiffs' Counsel, including myself, stating that there was a "Fake" complaint regarding Mr. Saltz that was posted on Findlaw.com claiming that Mr. Saltz was harassing Ms. Paulson as a witness, and that it was not Ms. Paulson's phone number on the complaint. (See Declaration of Michael J. Saltz, **Exhibit "1."**)

10. I reviewed the phone number provided on the "Fake" Findlaw.com complaint and discovered that the phone number listed is actually a number associated with Without a Crystal Ball in Minnesota and/or Ms. Paulson and/or Todd Paulson.

11. On January 18, 2021, I observed several tweets directed at Plaintiffs' Counsel, some of which included death threats. Below is a true and correct copy of a screenshot of a tweet directed at Mr. Saltz and Plaintiffs' Counsel generally from January 18, 2021:



12. Mr. Saltz brought the above tweet to Mr. Brown's attention, but he was unresponsive. (See **Exhibit "1"** to the Declaration of Michael J. Saltz.) Moreover, Mr. Brown left this portion of Counsel's email chain out of the exhibits he presented to this Court when he filed his papers requesting a status conference.

13. I have reviewed Mr. Brown's declaration submitted to the Court in conjunction with Defendants' Motion for Status Conference. Mr. Brown's declaration makes several incorrect and/or misleading statements, including but not limited to the following:

- 1 a. Mr. Brown stated: “Below is a screenshot from a video on a YouTube channel
2 that Mr. Saltz has promoted on his Twitter account.” Brown Decl. ¶ 4.
3 However, the screenshot referenced does not constitute evidence of a “video...
4 promoted” by Mr. Saltz. Additionally, I have conducted a comprehensive
5 search of Mr. Saltz’s Twitter page and have found no evidence that Mr. Saltz
6 has promoted this video, or any other video from any other YouTube creator
7 regarding any videos associated with this case or the parties in this case.
- 8 b. Mr. Brown stated: “Below are screenshots of just a few of the tweets Mr. Saltz
9 has posted to publicly accuse Ms. Paulson of the crime of hacking.” Brown
10 Decl. ¶ 5. In the screenshot directly below the statement, Mr. Saltz does not
11 “publicly accuse” anyone of hacking. Instead, the screenshot specifically states
12 that it is directed at “whomever” attempted the hacking, used a familiar email
13 address in the hacking efforts. The following two screenshots on page 7 of Mr.
14 Brown’s declaration do not accuse Ms. Paulson of hacking, but rather
15 memorialize Mr. Saltz’s efforts to list Ms. Paulson as a potential victim of the
16 hacking attempts in a report to the authorities and the Court. On page 8 of the
17 declaration, the screenshot also does not accuse Ms. Paulson anywhere of the
18 crime of hacking. Rather, it is a screenshot of Mr. Saltz spotting and
19 uncovering one of the hacker accounts harassing Mr. Saltz and others. To be
20 certain, the purported hackers admitted in a tweet the next day that the
21 Godisgreat account Mr. Saltz was confronting belonged to them. Below is a
22 true and correct screenshot of said tweet:



- c. "Attached as Exhibit A - C are true and correct copies of the emails Mr. Saltz sent me this morning accusing Ms. Paulson of federal crimes and demanding that I explain my "involvement." These statements are false and misleading. Further, Mr. Brown does not provide the entire email trail between Counsel to the Court. Nowhere in said email trail does it say that Mr. Saltz directly accused Ms. Paulson of "federal crimes." (See **Exhibit "1"** to the Declaration of Michael J. Saltz.)

14. My co-counsel and I have not made any idle threats of criminal prosecution in order to gain an advantage in this litigation. Instead, Mr. Saltz informed Mr. Brown that we had a forensic expert working to track down the hackers who were making death threats to Counsel and witnesses, which are serious crimes. Specifically, Mr. Saltz stated on January 18, 2021, "We are in the process of providing all of this information to the federal authorities and will be pressing charges once we determine all who are involved in the hacking attempts and the witness tampering." At no time did Mr. Saltz assert that Ms. Paulson or Mr. Brown are identified in the "all who are involved in the hacking attempts and the witness tampering."

1 15. On January 20, 2021, Mr. Brown sent another email indicating Ms. Paulson
2 received a purported notice from Google of another hacking attempt through her email address
3 on Mr. Saltz, and that it was not being done by Defendants. Mr. Saltz having recognized that the
4 email Ms. Paulson received was a fake phishing email, immediately requested the raw email
5 instead of a screenshot so that Plaintiffs' Counsel could track the email's origins and any
6 malicious coding therein. To date, Mr. Brown has not responded in any manner to this request.
7 Attached hereto as **Exhibit "3"** is a true and correct copy of the January 21, 2021 email chain
8 between Counsel.

9 16. The threats upon Defendants' perceived detractors have continued through the
10 date of the execution of this declaration.

11
12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

14
15 SIGNED on January 27, 2021

16
17 /s/ Elana R. Levine
18 Elana R. Levine
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EXHIBIT “1”

SAMPLING OF SOCIAL MEDIA POSTS SINCE THE FILING OF THIS LAWSUIT

DATE	CONTENT
October 31, 2020	Tati Westbrook has filed a lawsuit against me for defamation. I will be providing a detailed overview of the allegations. I have not been served in the case. My attorney in this case is confident their claims are baseless. We are confident the case is without merit.
October 31, 2020	Their filing is on the heels of their Business partner suing them for breach of contract, conversion, and fraud. Mr. Westbrook is facing a second lawsuit for fraud in California William Hake vs James Westbrook for failure to payback a loan of \$290,000.00.
October 31, 2020	I had initially considered privatizing videos made about the Westbrooks & removing public statements. However, on the advice of my attorney, I intend to keep all remaining statements public. I have reported on public records & exercised freedom of speech on a public matter.
October 31, 2020	<p data-bbox="732 827 1268 856">My Statement on Tati Westbrook Lawsuit</p> <p data-bbox="597 898 1406 1115">Tati & James Westbrook have filed a lawsuit against me for Defamation. I have not been served in this case. The filing alleges emotional distress & defamation for reporting on James Westbrook's multiple lawsuits for fraud In California & Hawaii. The lawsuit also alleges that I harmed Ms. Westbrook's reputation and is reason for why she is no longer on You Tube.</p> <p data-bbox="597 1157 1406 1478">My initial reporting outlined a lawsuit filed against Mr. Westbrook by his sisters alleging fraud related to their deceased mother's estate. In the lawsuit filed in District Court in Hawaii Case 1:14-cv-00353-HG-BMK, his sister alleged that he convinced his mother to sign a quit claim deed of her property to him, while she was gravely ill. His sister also alleged that after Mr. Westbrook filed the Quit Claim Deed & became sole owner of the property in the days before his mother passed away.</p> <p data-bbox="597 1520 1406 1736">After obtaining ownership of the property, his sister alleged that he took out numerous loans against the property. Mr. Westbrook's sister, Cheryl, provided an affidavit in court that their mother did not have a will & the children all shared 1/3 ownership to all property she left after her death. Mr. Westbrook denied his sister's claims.</p> <p data-bbox="597 1778 1406 1917">A judge in Hawaii ordered that Mr. Westbrook pay attorney fees & the estate management was awarded to his sister. A second lawsuit filed in California by William Hawke, alleged that Mr. Westbrook took out \$290,000 loan and used his mother's</p>

property as collateral. Mr. Hawke stated in the complaint that Mr. Westbrook never paid him back. Mr. Westbrook has denied the claims. The court case is still ongoing & is scheduled for trial in 2021.

A third lawsuit was filed against Tati & James Westbrook in California on October 20, 2020. In the lawsuit, Clark Swanson alleges that the Westbrook's defrauded and breached their business contract. Mr. Swanson alleges due to their actions. The couple opened businesses that were in breach of contract of their business & resulted in Mr. Swanson not receiving millions of dollars for the launch of her cosmetics line. Mr. Swanson also alleges that Mr. Westbrook "coffered" the company assets of Halo Beauty on October 9, 2020, which Mr. Swanson alleges harmed the members, business & devalued the company.

Tati Westbrook uploaded a video titled "Bye Sister" in May 2019 asserting that her husband, James, was a successful business man & suggested through his advice to James Charles helped propel his career. However, in the same video, Ms. Westbrook accused James Charles of sexual misconduct.

In May 2020. Ms. Westbrook publicly apologized to James Charles & asserted that she had been manipulated by Jeffree Star & Shane Dawson about the claims of sexual misconduct. She also asserted that James Charles promoting Sugar Bear Hair vitamins was not a motivation for her video. However, in the Court filing of Clark vs Westbrook & Westbrook, Mr. Swanson claims that Ms. Westbrook used her celebrity status & You Tube influence to convince him to give up 16.66% ownership of the company to make the Westbrooks majority owners. Mr. Swanson alleges that Ms. Westbrook promised him that James Charles among other You Tube friends would not promote competitors & only promote Halo Beauty vitamins. Mr. Swanson alleges her promise to him was undercut when Mr. Charles uploaded a swipe up ad for Sugar Bear Hair in April 2019.

At this time, In review of the lawsuit, my attorney is confident the allegations they've made against me are baseless and without merit. We are exploring legal options and are considering filing a countersuit at this time. Freedom of Speech & Freedom of the Press allows the media to report on matters of public interest & enables a person to give their opinions based upon Information they have found. At no time in my reporting, have I ever Knowingly made false statements about the Westbrooks nor has my reporting been done with malicious intent but rather to

	<p>provide insight into a public story that Ms. Westbrook made public by uploading Bye Sister and obtaining more than 40 million views for the video.</p> <p>Ms. Westbrook is alleging that her absence from Social media is due to actions that I have taken against her. However, my reporting of this story has been based upon public records, sources and my opinion based upon the public story. None of which is done with malice. At no point, does Ms. Westbrook acknowledge that her video Bye Sister & subsequent video "Breaking my Silence" & large public backlash could be a large reason she is not online. The Westbrook's falsely accuse me of being a "troll" & that I have created fake accounts to harass them & others. This is categorically false. The Westbrooks accuse me of being fired from Patheos for improper conduct, this is categorically false. The lawsuit accuses me of improper conduct & many other false statements. They are seeking \$5 million dollars from me. In the lawsuit Clark Swanson vs Tati & James Westbrook, Mr. Swanson alleges that the couple started a cosmetics line outside of their business agreement with Halo Beauty. In the lawsuit Mr. Swanson alleges the Westbrooks earned around \$16 million for the sale of a pallet and deprived him of his 1/3 revenue of that pallet - which is just over \$5 million.</p> <p>Thank you!</p>
October 31, 2020	NO screaming or yelling. I have been consulting with my attorney & we are also working with a PR team. The lawsuit is without merit.
November 1, 2020	Despite the very exciting and salacious details of the lawsuit, the allegations against me in the lawsuit are 100% false and without merit.
November 1, 2020	The allegation that I have potentially a hundred defendants that are trolls and interfering in her business is 100% false & absolutely without a merit. I have never conspired with anyone nor interfered in any aspect of her business.
November 6, 2020	Lol, I delete so much evidence – cause I'm that stupid
November 6, 2020	It my belief, that Tati & James Westbrook along with their attorney have utilized drama channels to spread defamatory statements about me. It is my belief that they are using this lawsuit to use me as a scapegoat & to deflect from their lawsuit for fraud in California.
November 6, 2020	I will make no more statements at this time. I said everything I needed to say in my live tonight & in these tweets. The rest will play out in court. This is not over.

November 8, 2020	Also, the evidence released, kind of proves that Im not the reason for someone's company getting hurt. The partners are each blaming the other for the damage to the company & my name isn't ever mentioned [] my opinion
November 8, 2020	According to the documents I read, it seems like they were kind of arguing about the business direction & they are Both accusing the other of the company being damaged before I knew they existed [] my opinion. I will wait for everyone else to catch up & maybe apologize
	In regards to the oxygen tweet, I can only say there was zero implication that anyone killed anyone. The woman was very, very sick. The removal of oxygen was due to her illness being at end of life. In my article, I was clear what happened. No one killed anyone.
January 7, 2021	Imagine being hired as an attorney to file a baseless lawsuit, then running a smear campaign on Twitter to seek revenge for reporting from public records - knowing damn well the person being sued isn't the source of your clients issues. Then imagine getting sued for it []
January 7, 2021	Email communications go both ways – trust me. Just like I'm being watched – so are you. We know everything.
January 8, 2021	Imagine if I filed a court document claiming residency in one state, then claim residency in another state at the same time in another court. The internet would call for my arrest & have me in prison.
January 17, 2021	People were also trying to hack me last night too! My god! Quit it! I had to get YouTube involved! Trolls are out of control, but it's unethical to continue to use Twitter to harass me & accuse me of Crimes! Stop trying to contact me!
January 18, 2021	Every single person that has willingly involved themselves in this case & knowingly filed FALSE declarations against me, will be held legally responsible. Know this. Perjury is a crime.
January 18, 2021	Today was the last straw – threatening an attorney in a federal case of committing a felony without any evidence & relying on false “statements” from mentally disturbed & unwell people, is unethical & in the state of California, lawyers are prohibited from doing this.

EXHIBIT “2”

SAMPLING OF VIDEOS SINCE THE FILING OF THIS LAWSUIT

Date	Name of Video	Statements Regarding Case
October 31, 2020	It's True about The Westbrooks & I will Be Ok	
October 31, 2020	This Channel Will Keep Going	
November 7, 2020	Deleting this later - Can't Wait to Destroy More Evidence	
November 9, 2020	My story, My statement, & My mistakes	At approximately six minutes into the video, Defendants claimed that the same accounts that have been going after her for 18 months are now being "touted as sources for Tati Westbrook's attorneys." At approximately 14 minutes into the video, Defendants ask their audience to reconsider their involvement with "these trolls for the sake of our whole community." At approximately 16 minutes into the video, Defendants state that Plaintiffs' Counsel, Michael Saltz "has violated multiple rules under the Washington State Professional Conduct rules...Now due to his behavior and involvement with trolls I have grounds to not only file grievances against him in the State of Washington and California, but also to file a countersuit against him for defamation, interference with business, and harm to a competitor."
November 12, 2020	I'm Sorry, Taking Accountability	
November 25, 2020	Update on the Lawsuit / Responding to Criticism / How to Give Back	During the video, Ms. Paulson spoke extensively regarding the case, including the then-upcoming filing of the Motion to Dismiss, and also claimed to not delete evidence relating to the case. Specifically, Ms. Paulson stated, "Like I can delete anything I want if it's not related so that's actually not true and we have a response coming out to that because I didn't destroy any property, I didn't destroy any evidence of anything."
November 29, 2020	Am I Ok?	At approximately 9 minutes into the video, Defendant claims that when the lawsuit was filed it was "shocking" because the [June 2019] Patheos article had not been online for a

		<p>long time, and corrections were made to said article “right away.” At approximately 11 minutes into the video, Defendants state that they have always “tried to stick to being objective being as unbiased¹ as possible.” At approximately 12 minutes into the video, Defendants state that falsely accusing someone of a crime is serious, and if someone is going to go onto YouTube and accuse someone of a crime, they “should for sure have evidence that a crime has been committed.” At approximately 17 minutes into the video, Defendants state that Plaintiffs arbitrarily decided that she was the problem, stating, “because somebody with nine million subscribers decided I was the problem...that for all of her issues knowing the history of this person. At approximately 35 minutes into the video, Defendants state that because Mrs. Westbrook has nine million YouTube subscribers, they are “automatically” going to hate her. Defendant further stated that Mrs. Westbrook created her own mess through her own problematic history and is now “suddenly” suing Defendants. Defendants further state that there is “so much evidence to prove that it is all bs...”</p>
December 2, 2020	Will I lose Everything?	
December 6, 2020	Moving Forward is Hard but Necessary	
December 9, 2020	No One Deserves Anything	In the video, Defendants reiterated their denial of the allegations of the complaint and stated that they were “likely just deleting” comments or questions relating to the case.
December 27, 2020	Venting Out Our Frustrations	During the video, Ms. Paulson appeared with her husband, and referenced this case by stating “that people need to think they need to think about what they're doing and what they're saying before they before they just run with

¹ This statement is in contrast to Defendants’ October 30, 2020 tweet regarding Mrs. Westbrook wherein she stated that she was biased because she had “done months of research” on the story and “her husband is a damn fraud.”

		crap that could literally destroy somebody's life.”
December 29, 2020	All of this NEEDS to STOP	During this three-hour live stream, Defendant stated, “I think it’s irresponsible if you’re going to cover say a legal situation and you don’t have the court documents or you’re going to talk about property stuff and you don’t have the property records. Like any outlet should have the records, the public records ² that you need to present the story in which you’re going to present.”
January 7, 2020	The Worst Day Ever	During the video, Ms. Paulson states, The vintage Katie is back. I am not placating. I'm not gonna pretend to be less me. I'm not gonna listen to my YouTube manager and be like: ‘you should do things that don't upset your audience.’ Dude, everything I do upsets my audience. Like, no. ‘Well are there topics that you can avoid?’ Anyways, don't feel bad about defending me. Defend me! Go for it! Have fun! Like, don't feel like just because you defend me that they can make an example out of you, because we'll make an example out of them! We will! We'll prove to everyone what they're doing to you guys. Don't be quiet. Don't be shy. Speak your truth. I always used to say, like: ‘Don't feel like you have to defend me.’ But now I'm saying like, if you're seeing this bullshit, and you feel compelled, you can defend me. You can! You can speak out against bullying. You can! You can tell the trolls to ‘go away!’ You can tell them they're not welcome. The reason why they are so, um, invested here, is because they feel like they can, and that you guys aren't going to respond because I've told you not to. And they've manipulated that. And they have pounced on that. So I just say: I have your back. You're not going to get harassed. And if you do, you just send me a dm and you tell me, and I'll put them

² This statement is in contrast to her numerous public statements regarding Plaintiffs being frauds, and in particular, Mr. Westbrook having a lengthy criminal history, without presenting public records to support said statements.

		on blast! They're not going to mess with you. We'll take care of it.
January 16, 2021	This is Really Bad – She's Done	During the first minute of the video, which concerns three individuals who are not parties to this lawsuit, Trisha Paytas, Shane Dawson, and Jeffree Star, Defendants state that what Ms. Paulson is "currently going through" is "entangled in all of this." Defendants further state that they in their current situation because of Jeffree Star, and that Defendants are the "scapegoat." At 15 minutes into the video Defendants state "everything that you're hearing right now is a big fat smoke screen."

EXHIBIT “3”

Lani Levine

From: Michael Saltz
Sent: Wednesday, January 20, 2021 10:47 AM
To: Michael P. Brown; Lani Levine; Jeffrey Bilanko; Suki Kaplan
Subject: 3171-005 RE: Another fake



**JACOBSON, RUSSELL, SALTZ,
NASSIM & DE LA TORRE LLP**

Mr. Brown:

That email is most likely not genuine. Do not click any links on it. Doing so will likely download spyware into any computer or device that does so.

My email is not a Google email. Further, I have not yet seen any corresponding alert from Google on my end.

Please forward the raw email to us so that we may have our forensic expert trace the email tracking information coded therein to verify its origin and the spyware danger it contains.

Yours truly,

Michael J. Saltz, Esq.
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From: Michael P. Brown <mbrown@gordontilden.com>

Sent: Wednesday, January 20, 2021 10:36 AM

To: Michael Saltz <msaltz@jrsnd.com>; Lani Levine <lanil@jrsnd.com>; Jeffrey Bilanko <jbilanko@cbblegal.com>; Suki Kaplan <skaplan@cbblegal.com>

Subject: Another fake

Katie did not do this. The attempts to attach her email to other accounts, without her knowledge or permission, has continued.

Begin forwarded message:

From: Google <noreply@google.com>

Subject: Google Verification Code

Date: January 20, 2021 at 4:09:35 AM CST

To: withoutacrystalball78@gmail.com



Google Verification Code

Google received a request to use this email address to help recover Google Account msaltz@jrsnd.com.

830807

Enter the code when asked for it to show that Google can reach you at this email address.

If you don't recognize msaltz@jrsnd.com, someone probably gave your email address by mistake. You can safely ignore this email.

Sincerely,

The Google Accounts Team

This email can't receive replies. For more information, visit the [Google Accounts Help Center](#).

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